

20-1025 (Lead); 20-1138 (Consolidated)

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

ENVIRONMENTAL HEALTH TRUST; CONSUMERS FOR SAFE CELL PHONES; ELIZABETH BARRIS; THEODORA SCARATO

CHILDREN'S HEALTH DEFENSE; MICHELE HERTZ; PETRA BROKKEN; DR. DAVID O. CARPENTER; DR. PAUL DART; DR. TORIL H. JELTER; DR. ANN LEE; VIRGINIA FARVER, JENNIFER BARAN; PAUL STANLEY, M.Ed.

Petitioners

v.

FEDERAL COMMUNICATIONS COMMISSION;
UNITED STATES OF AMERICA

Respondents

Petition for Review of Order Issued by the
Federal Communications Commission

**DECLARATION OF W. SCOTT MCCOLLOUGH IN SUPPORT OF
PETITIONERS' APPLICATION BY MOTION FOR ATTORNEYS' FEES**

I, W. Scott McCollough, declare as follows:

1. I am an attorney admitted to practice before this Court.
2. I am the principal of McCollough Law Firm PC, one of the attorneys of record for Petitioners Children's Health Defense; Michele Hertz; Petra Brokken; Dr. David O. Carpenter; Dr. Paul Dart; Dr. Toril H. Jelter; Dr. Ann Lee; Virginia Farver, Jennifer Baran and Paul Stanley, M.Ed. (collectively

“CHD” or “Petitioners”). McCollough Law Firm PC served as outside counsel for CHD.

3. This declaration is submitted in support of CHD’s Application by Motion for Attorneys’ Fees Under the Equal Access to Justice Act (“Motion”). This Motion seeks recovery of some of the attorney’s and Paralegal fees charged by my firm to prosecute the matter. Robert F. Kennedy, Jr. also served as counsel and was on the papers but Petitioners do not seek recovery of any fees for his time or services. CHD also assigned other personnel, including subject-matter experts, to this effort and they dedicated and extraordinary amount of time to the Matter. Even though those costs are at least arguably recoverable under 28 U.S.C. §2412(d)(2)(A), Petitioners do not seek recovery here.

4. I am familiar with and have reviewed the standards for claiming fees under the Equal Access to Justice Act (“EAJA”).

5. Children’s Health Defense (“CHD”) is a national non-profit 501(c)(3) organization whose mission is to end the epidemic of children’s chronic health conditions by working aggressively to eliminate harmful exposures to environmental toxins via education, obtaining justice for those already injured and promoting protective safeguards. CHD has no parent corporation, and no publicly-held company has a 10% or greater ownership interest in the organization. *See Petitioners’ Opening Brief, p. 4 (iv), Doc*

#1870852 (Nov. 12, 2020). CHD entirely funded this litigation on behalf of all CHD-related Petitioners and is therefore eligible to recover fees, assuming all other criteria are met.

Relevant Experience and Background

6. I received a B.A. from the University of Texas at Austin in 1978 and a J.D. from the University of Texas at Austin in 1982. I received my license to practice law in Texas in 1983. I am a member of the Texas state bar. I am admitted to practice before this Court along with the Fifth, Ninth and Tenth Circuits and various federal district courts, including the Western District of Texas.

7. I have been practicing trial and appellate litigation for thirty-eight years. My principal focus has always been administrative law, with most of that time dedicated to telecommunications and utility regulatory matters. I have handled more than two thousand state and federal administrative proceedings (adjudications and rulemakings). Over the years I have participated in more than one hundred judicial appeals from agency decisions in state or federal courts and was a lead or primary counsel for many of those. A true and correct copy of my current biography is attached to this Declaration as Attachment A.

Fees Sought for this Action

8. McCollough Law Firm, PC represented the CHD Petitioners in their petition seeking review of the FCC's decision to terminate its Notice of Inquiry in FCC ET Docket No. 13-84, *Reassessment of Federal Communications Commission Radiofrequency Exposure Limits and Policies* (Dec. 4, 2019).¹ All activity began in January 2020. In accordance with Firm procedures, a written fee agreement applied to work performed by Firm personnel for the CHD Petitioners. The Firm opened a specific internal matter identification code for work performed in handling the Petition for Review. No overlapping billing statements are claimed with respect to other work done on behalf of any of the CHD Petitioners in any other matter. I refer in this Declaration solely to work performed in connection with the Petition for Review as work performed on the "Matter." Work performed in seeking recovery of attorneys' fees under EAJA, or for the costs we have already recovered pursuant to Fed. R. App. Proc. 39, is not included as work performed on the "Matter."

9. I am the sole Firm-assigned attorney for the Matter. I was responsible for the initial billing and I prepared the fee recovery summary contained

¹ The Firm did not have any involvement in the case while it was at the Commission. All fees requested herein relate to work done on the Petition for Review of the decision after it was issued.

in Attachment D. All fees incurred in connection with Matter have been fair, reasonable, and appropriate.

10. My customary fee is \$350 per hour. This rate is quite low in light of my experience and expertise. I am familiar with the hourly billing rates customarily charged by private-sector attorneys and other law-firm personnel possessing a similar level of experience and expertise as those performing work for our Firm on the Matter. Based on my personal knowledge of the District of Columbia legal market (and the Washington, D.C. area generally), as well as communications with clients, attendance at bar functions and other professional activities, and trade press reports, the actual billing rates charged for each timekeeper in the Matter are at (indeed far below) market rates for comparable firms, especially in the D.C. area and for FCC matters; most of my peers charge up to or more than \$750 per hour. I have consciously set my fee low so that consumers, non-profits, governmental agencies and small competitive providers with limited resources can better afford the kind of all-too-common and often unavoidable but costly and complex litigation in this area.

11. The adjusted statutory rates used in connection with this Motion are also well below prevailing market rates in the District of Columbia, as demonstrated by information from the Justice Department. In light of *DL v. District of Columbia*, 924 F.3d 585 (D.C. Cir. 2019) the U.S. Attorney's Office

for the District of Columbia, Civil Division now uses the “*Fitzpatrick*” matrix (available at <https://www.justice.gov/usao-dc/page/file/1189846/download>) to establish prevailing market rates in the Washington, D.C. area. The current “*Fitzpatrick*” matrix (Hourly Rates for Legal Fees for Complex Federal Litigation in the District of Columbia” for attorneys with 35+ years’ experience was \$731 per hour in 2020 and is now \$736 per hour.² See Attachment B. This information further reflects the reasonableness of the rates claimed in connection with the Matter.

12. CHD seeks fees only at EAJA’s statutory rate of \$125 per hour, plus an upward adjustment for cost-of-living increases. The cost-of-living adjustments have been calculated based on the Consumer Price Index for All Urban Consumers (CPI-U) for the Washington, D.C. area. Attachment C is a true and correct copy of CPI-U data for the years 2020 and 2021, which was obtained from the Bureau of Labor Statistics Databases, Tables & Calculators by Subject page at <https://data.bls.gov/cgi-bin/surveymost?cu>, and selecting “Washington, All items - CUURS35ASA0. I then chose “Output Options” “From 1996 to 2021” to obtain the information in Attachment C. The cost-of-living adjustments reflect the annual CPI-U data for 2020 and the semi-annual

² Fitzpatrick Matrix note 2 recognizes it is not intended for use in cases in which the hourly rate is limited by statute. E.g., 28 U.S.C. § 2412(d). Petitioners refer to it only to justify reasonableness. As noted, they are using the statutory formula.

CPI-U data for 2021. The statutory cap is \$125. The CPI-U annual average for when that cap was enacted in March of 1996 was 155.7. The 2020 CPI-U for 2020 was 267.157 and the CPI-U for the first half-year of 2021 is 273.603.³ The basic formula for the calculation is:

$$\frac{\$125 \times \text{CPI-U for year work performed}}{155.7}$$

Accordingly, the adjusted annual billing rates for 2020 and 2021 are:

$$\text{2020 rate} = (\$125 \times 267.157) / 155.7 = \$214.48 \text{ per hour}$$

$$\text{2021 rate} = (\$125 \times 273.603) / 155.7 = \$219.65 \text{ per hour}$$

13. Throughout the Matter, I and the other timekeeper (a Paralegal) kept contemporaneous records of time spent and recorded the time in the Firm's record-keeping system. Both the amount of time spent each day and a description of the work performed have been recorded. We used our billing information as the source then reformatted it for clarity in presentation.

14. Attachment D forms the detailed justification for our fee recovery request. Certain reductions and adjustments were made to the original source data to arrive at the total number of hours claimed for recovery. They are detailed below.

³ The CPI-U data for the first half of 2021 is the most recent data currently available. See Attachment C.

15. Billing entries for certain tasks (and the associated number of hours) were eliminated based on a good-faith understanding of what items courts typically do and do not grant as recoverable under EAJA as a general matter. Specific entries corresponding to items for which recovery is not claimed – *e.g.*, duplication of effort, or where time has been spent on clerical tasks or media relations – have been eliminated. Other entries that are irrelevant to the determination of this Motion were eliminated and no fees are sought regarding them.

16. CHD initially filed in the Ninth Circuit⁴ and the other Petitioner group came to this Court.⁵ The Commission sought transfer of the Ninth Circuit case to this Court. The CHD Petitioners vigorously contested transfer, but to no avail: the Ninth Circuit ordered transfer on April 24, 2020. We have voluntarily removed all billing entries related to the contested transfer. We also removed all entries related to admission to the Ninth Circuit, consistent with precedent.

17. The Petitioners sought an order from this Court remanding to the Commission and requiring reasoned decisionmaking with regard to the order

⁴ *Children's Health Defense; et al., v. Federal Communications Commission; United States of America*, Ninth Circuit Case No. 20-70297 (filed Feb. 2, 2020).

⁵ *Environmental Health Trust, Consumers for Safe Cell Phones, Elizabeth Barris, and Theodora Scarato v. Federal Communications Commission; United States of America*, D.C. Circuit Case No. 20-1025, Doc. #1827086 (filed Jan. 31, 2020).

terminating the Notice of Inquiry. It was one “lawsuit” seeking a specific type of relief (remand for reasoned decisionmaking) and all individual arguments in support of that relief were related; in other words, they were each contentions raised in support of the same relief and all concerned the same factual scenario.

Am. Petroleum Inst. v. United States EPA, 72 F.3d 907, 911-12 (D.C. Cir. 1996).

The case could not have been brought or litigated though “separate lawsuits.”

C.f., Hensley v. Eckerhart, 461 U.S. 424, 435 (1983). Thus all efforts toward the single form of relief sought should be recoverable since Petitioners obtained the goal sought (remand for reasoned decision). *Am. Petroleum Inst.*, *supra*;

Hensley, *supra*; *Goos v. Nat'l Ass'n of Realtors*, 68 F.3d 1380, 1385 (D.C. Cir. 1995).

Stated succinctly, Petitioners obtained “excellent results” and any “reduction must be justified in light of the [Petitioners’] overall degree of success.” *Goos v. Nat'l Ass'n of Realtors*, 74 F.3d 300, 302 (D.C. Cir. 1996) (on rehearing).

18. The Court’s decision disposed the Matter by addressing fifteen related arguments for remand and whether there was reasoned decisionmaking or other error for on that point. The Court found remand was necessary for eight of the fifteen reasoned decisionmaking arguments pressed by the Petitioners. It also rejected a NEPA procedural argument and found that five Petitioner-suggested failures had not been adequately preserved below and were therefore

not properly before the Court. The discrete arguments in support of remand brought by the Petitioners were or related to:

- a. Standard of Review;
- b. General standards in light of evidence of negative health effects caused by exposure to RF radiation at levels below the limits set by the Commission's 1996 guidelines;
- c. Standards in light of evidence of radiation sickness, and adverse effects on sleep, memory, learning, perception, motor abilities, prenatal and reproductive health, and children's health;
- d. Failure to respond to comments concerning environmental harm caused by RF radiation;
- e. Failure to discuss the implications of long-term exposure to RF radiation;
- f. Failure to discuss effects of RF pulsation or modulation (two methods of imbuing radio waves with information);
- g. Failure to discuss the implications of technological developments that have occurred since 1996, including the ubiquity of wireless devices and Wi-Fi, and the emergence of "5G" technology;
- h. Failure to adequately explain the Commission's refusal to modify its procedures for determining whether cell phones comply with its RF limits;
- i. Standards in light of evidence of cancer;
- j. Individual statutory and common law based individual rights;
- k. Americans with Disabilities Act and Fair Housing Act;
- l. Costs and benefits;
- m. Burden of proof;
- n. Individual remedies; and
- o. NEPA – Failure to issue EA or EIS

19. The Petitioners prevailed on argument a – h (8 arguments). They did not prevail on arguments i – o (7 arguments).

20. Even though (as explained above) Petitioners should recover fees expended on all arguments because they were all related to the same relief and obtained excellent results, Petitioners have made voluntary reductions to mitigate any concerns regarding total cost “in light of the [Petitioners’] overall degree of success.” *Goos v. Nat'l Ass'n of Realtors*, 74 F.3d at 302 (on rehearing). Those voluntary reductions are explained below.

21. All time recorded where the billing entry reflects the work related to an argument where the Court did not agree warranted remand (issues i – o) was voluntarily removed. The removed attorney time totaled 113.55 attorney hours and 95.3 Paralegal hours.

22. Attachment D to this Declaration is a spreadsheet that fairly and accurately summarizes the Firm’s contemporaneously maintained time records, net of all adjustments. The entries have been edited and in some instances broken out into separate rows to avoid the type of “block billing” reasonableness review issues identified in *Role Models America, Inc. v. Brownlee*, 353 F.3d 962, 971 (D.C. Cir. 2004).

23. The services rendered and time expended on this action were fair, reasonable, and appropriate in connection with obtaining the successful result on the Petition for Review in this action.

24. I performed all aspects of the attorney work undertaken on behalf of the CHD Petitioners, including briefing and arguing the case before this Court. The claimed hours, net of all reductions are 707.5 attorney and 234.2 Paralegal hours in 2020, and 85.2 attorney and 0 Paralegal hours in 2021. The total hours for both years are 792.7 attorney hours and 234.2 Paralegal hours.

25. The Firm assigned work to one Paralegal who assisted in a substantive way in the Matter as needs arose by conducting legal research, assisting in the preparation and editing of the various documents for filing (especially the Deferred Appendix) and assisting with preparation for argument. This biller's name is Pandy Shen. Ms. Shen was a third-year law student at the University of Texas. She was specifically hired for this project because of her unique skills that fit the firm's needs. Ms. Shen was adept at managing and organizing large volumes of files and documents for case presentation and also well-versed in grammar and writing. Ms. Shen oversaw and was substantially involved in the major task of document identification within the FCC record, then the gathering, organization and creation of the Deferred Appendix. Ms. Shen also assisted in the preparation of the Standing affidavits and reviewed and

commented on the briefing content and gathered some of the caselaw used in briefing and oral argument preparation.

26. The Firm billed Ms. Shen at \$60 per hour. This is significantly lower than the U.S. Attorney's Office for the District of Columbia, Civil Division "Fitzpatrick matrix" 2020 (\$199) and 2021 (\$200) amounts for "Paralegals/Law Clerks." In *Richlin Security Service Co. v. Chertoff*, 553 U.S. 571 (2008), the Supreme Court held that a prevailing party that satisfies EAJA's other requirements may recover its paralegal fees from the Government at prevailing market rates. The petitioner's law firm in that case billed paralegal fees "ranging from \$50 per hour to \$95 per hour." The Supreme Court found that those amounts were reasonable and within the market rate during the period involved (2004-2005). Therefore \$60 per hour is reasonable and clearly below the market rate for Paralegal/Law Clerks in 2020-2021.

27. The figures in Attachment D were all drawn from contemporaneously maintained billing records, and they fairly and accurately summarize the actual billing, after all adjustments.

28. In sum, the following total hours are being claimed, by timekeeper: W. Scott McCollough, 792.7 hours and Pandy Shen, 234.2 hours. These figures are all drawn from contemporaneously maintained billing records, which are fairly and accurately summarized in Attachment D. The result of applying the

attorney hours to the CPI-adjusted statutory rate and then adding Paralegal hours produces a total reasonable amount of **\$184,515.07**. CHD requests an order awarding fees in that amount.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed December 13, 2021, at Dripping Springs, Texas.



W. Scott McCollough

McCollough Declaration Attachment A

W. SCOTT MCCOLLOUGH
Principal, McCollough Law Firm PC
2290 Gatlin Creek Rd.
Dripping Springs, Texas 78620
Phone: 512.888.1112
Fax: 512.692.2522
wsmc@dotlaw.biz



EDUCATION

Licensed May 1983

University of Texas School of Law: J.D., August, 1982 (with Honors)

University of Texas at Austin: B.A. in Government/Pre-Law, 1978 (with Honors)

PRACTICE

Unparalleled knowledge and experience relating to those places where technology and regulation intersect – and often collide – all the way up the protocol stack.

Clients include competitive communications companies, Internet service and application providers. Focus on public law and regulation relating to telecommunications, computers, Internet, privacy, procurement, electric and gas utilities, economic regulation, consulting, governmental relations, and instruction and training to individuals, groups, companies and governmental agencies.

Past Contract Consumer Advocate (representing residential and small business consumers) with City of Austin Electric Utility (1994-1999). Former Regulatory Counsel for Texas ISDN Users Group and Texas Internet Service Providers Association.

PRIOR EMPLOYMENT EXPERIENCE

Shareowner, McCollough Henry PC, February, 2009 to May, 2017.

Sole Proprietor, Law Offices of W. Scott McCollough, May, 2002 to January, 2009.

Shareholder, Stumpf, Craddock, Massey & Pulman, April 2000 to April, 2002.

Sole Shareowner, McCollough and Associates, P.C., July 1998 to 2000.

Sole Shareowner, W. Scott McCollough, P.C., August 1995 to July 1998.

Partner, Bledsoe, Brown, Evans & McCollough, April 1994 to April 1996.

Faculty member, Center for Lifelong Engineering Education, 1987 to 2002.

Instructor in "Telecommunications Management and Regulation" course for government and private industry voice and data network managers.

Chief, Public Agency Representation Section, Assistant Texas Attorney General, June 1984 to January, 1994 Represented State of Texas before regulatory agencies with jurisdiction over gas, telephone, water and electric utilities, and on appeal. Assisted and advised state agencies and local 9-1-1 emergency service providers in utility and network planning, purchasing, operation and interconnection. Represented agencies in billing and rating disputes with utilities. Served as regulatory counsel for General Services Commission and regulatory and general counsel for Advisory Commission on State Emergency Communications. Past Member, State Cogeneration Council and Relay Texas Advisory Council.

Associate, Bickerstaff, Heath & Smiley, May 1983 to June 1984

Telecommunications, general/administrative/civil law.

Computer Operator, Contributing Editor, Biomedical Engineering Department, Biological Transport Lab, University of Texas at Austin, January 1979 to June 1984.

Researched medical, biological, chemical aspects of novel treatment for end-stage renal disease. Formulated, generated, computed and compiled mathematical modeling and analysis of data for nationwide testing program sponsored by National Institutes of Health.

PERSONAL DATA

Born: October 30, 1954, San Antonio, Texas

Service in U.S.M.C., Grade E-5, MOS 0351; Legal Clerk, Administrative Law Section, Staff Judge Advocate Office; Disabled Veteran; Honorable Discharge January 1976.

McCollough Declaration Attachment B

THE FITZPATRICK MATRIX

Hourly Rates (\$) for Legal Fees for Complex Federal Litigation in the District of Columbia

Years Exp. / Billing Yr.	2013	2014	2015	2016	2017	2018	2019	2020	2021
35+	535	563	591	619	647	675	703	731	736
34	534	562	590	618	646	674	702	729	734
33	532	560	588	616	644	672	700	728	733
32	530	558	586	614	642	670	698	726	730
31	527	555	583	611	639	667	695	723	728
30	524	552	580	608	636	664	692	720	725
29	521	549	577	605	633	661	689	717	721
28	517	545	573	601	629	657	685	713	717
27	512	540	568	596	624	652	680	708	713
26	508	536	564	592	620	648	676	704	708
25	502	530	558	586	614	642	670	698	703
24	497	525	553	581	609	637	665	693	697
23	491	519	547	575	603	630	658	686	691
22	484	512	540	568	596	624	652	680	684
21	477	505	533	561	589	617	645	673	677
20	470	498	526	553	581	609	637	665	670
19	462	490	518	546	574	602	630	658	662
18	453	481	509	537	565	593	621	649	653
17	445	473	500	528	556	584	612	640	645
16	435	463	491	519	547	575	603	631	635
15	426	454	482	510	538	566	593	621	626
14	416	443	471	499	527	555	583	611	615
13	405	433	461	489	517	545	573	601	605
12	394	422	450	478	506	534	562	590	594
11	382	410	438	466	494	522	550	578	582
10	371	399	427	455	483	510	538	566	570
9	358	386	414	442	470	498	526	554	558
8	345	373	401	429	457	485	513	541	545
7	332	360	388	416	444	472	500	528	532
6	319	347	375	403	431	458	486	514	518
5	305	332	360	388	416	444	472	500	504
4	290	318	346	374	402	430	458	486	489
3	275	303	331	359	387	415	443	471	474
2	260	287	315	343	371	399	427	455	458
1	244	272	300	328	356	384	412	439	442
0	227	255	283	311	339	367	395	423	426
P*	130	140	150	160	169	179	189	199	200

* = Paralegals/Law Clerks

Explanatory Notes

1. This matrix of hourly rates for attorneys of varying experience levels and paralegals/law clerks has been prepared to assist with resolving requests for attorney's fees in complex civil cases in District of Columbia federal courts handled by the Civil Division of the United States Attorney's Office for the District of Columbia. It has been developed to provide "a reliable assessment of fees charged for complex federal litigation in the District [of Columbia]," as the United States Court of Appeals for the District of Columbia Circuit urged. *DL v. District of Columbia*, 924 F.3d 585, 595 (D.C. Cir. 2019). The matrix has not been adopted by the Department of Justice generally for use outside the District of Columbia, nor has it been adopted by other Department of Justice components.
2. The matrix is intended for use in cases in which a fee-shifting statute permits the prevailing party to recover "reasonable" attorney's fees. *E.g.*, 42 U.S.C. § 2000e-5(k) (Title VII of the 1964 Civil Rights Act); 5 U.S.C. § 552(a)(4)(E) (Freedom of Information Act); 28 U.S.C. § 2412(b). A "reasonable fee" is a fee that is sufficient to attract an adequate supply of capable counsel for meritorious cases. *Perdue v. Kenny A. ex rel. Winn*, 559 U.S. 542, 552 (2010). The matrix is not intended for use in cases in which the hourly rate is limited by statute. *E.g.*, 28 U.S.C. § 2412(d).
3. For matters in which a prevailing party agrees to payment pursuant to this fee matrix, the United States Attorney's Office will not request that a prevailing party offer the additional evidence that the law otherwise requires. *See, e.g., Eley v. District of Columbia*, 793 F.3d 97, 104 (D.C. Cir. 2015) (quoting *Covington v. District of Columbia*, 57 F.3d 1101, 1109 (D.C. Cir. 1995) (requiring "evidence that [the] 'requested rates are in line with those prevailing in the community for similar services'")).
4. The years in the column on the left refer to an attorney's years of experience practicing law. Normally, an attorney's experience will be calculated based on the number of years since an attorney graduated from law school. If the year of law school graduation is unavailable, the year of bar passage should be used instead. Thus, an attorney who graduated from law school in the same year as the work for which compensation is sought has 0 years of experience. For all work beginning on January 1 of the calendar year following graduation (or bar admission), the attorney will have 1 year of experience. (For example, an attorney who graduated from law school on May 30 will have 0 years of experience until December 31 of that same calendar year. As of January 1, all work charged will be computed as performed by an attorney with 1 year of experience.) Adjustments may be necessary if an attorney did not follow a typical career progression or was effectively performing law clerk work. *See, e.g., EPIC v. Dep't of Homeland Sec.*, 999 F. Supp. 2d 61, 70-71 (D.D.C. 2013) (attorney not admitted to bar compensated at "Paralegals & Law Clerks" rate).
5. The data for this matrix was gathered from the dockets of cases litigated in the U.S. District Court for the District of Columbia using the following search in Bloomberg Law: keywords ("motion n/5 fees AND attorney!" under "Dockets Only") + filing type ("brief," "motion," or "order") + date ("May 31, 2013 – May 31, 2020" under "Entries (Docket Key Only)"). This returned a list of 781 cases. Of those, cases were excluded if there was no motion for fees filed, the motions for fees lacked necessary information, or the motions involved fees not based on hourly rates, involved rates explicitly or implicitly based on an existing fee matrix, involved rates explicitly or implicitly subject to statutory fee caps (*e.g.*, cases subject to the Equal Access to Justice Act (EAJA), 28 U.S.C. § 2412(d)), or used lower rates prescribed by case law (*e.g.*, *Eley*, 793 F.3d at 105 (Individuals with Disabilities in Education Act

cases)). After these excisions, 86 cases, many of which included data for multiple billers (and 2 of which only provided hourly rate data for paralegals), remained.

6. The cases used to generate this matrix constitute complex federal litigation—which caselaw establishes as encompassing a broad range of matters tried in federal court. *E.g., Reed v. District of Columbia*, 843 F.3d 517, 527-29 (D.C. Cir. 2016) (Tatel, J., concurring) (noting that cases arising under the Freedom of Information Act, Title VII, the Americans with Disabilities Act, Constitutional Amendments, antitrust statutes, and others have been deemed complex, and even “relatively small” cases can constitute complex federal litigation, as they too require “specialized legal skills” and can involve “complex organizations,” such as “large companies”); *Miller v. Holzmann*, 575 F. Supp. 2d 2, 14-16, 17 (D.D.C. 2008) (prevailing market rates for complex federal litigation should be determined by looking to “a diverse range of cases”). That the attorneys handling these cases asked the court to award the specified rates itself demonstrates that the rates were “adequate to attract competent counsel, [while] not produc[ing] windfalls to attorneys.” *West v. Potter*, 717 F.3d 1030, 1033 (D.C. Cir. 2013) (quoting *Blum v. Stenson*, 465 U.S. 886, 897 (1984)). As a consequence, the resulting analysis yields the “prevailing market rate[] in the relevant community” for complex litigation undertaken in federal courts in the District of Columbia. See *Blum*, 465 U.S. at 895.
7. From these 86 complex federal cases, the following information was recorded for 2013 and beyond: hourly rate, the calendar year the rate was charged, and the number of years the lawyer was out of law school when the rate was charged (or, if law school graduation year was unavailable, years since bar passage), as defined above. If the graduation or bar passage year was not stated in a motion or its exhibits, then the lawyer’s biography was researched on the internet. Although preexisting fee matrices for the District of Columbia provide for mid-year rate changes, very few lawyers in the data submitted rates that changed within a calendar year. For this reason, the matrix was modeled using one rate for each calendar year. On the occasions when a lawyer expressed an hourly rate as a range or indicated the rate had increased during the year, the midpoint of the two rates was recorded for that lawyer-year.
8. The matrix of attorney rates is based on 675 lawyer-year data points (one data point for each year in which a lawyer charged an hourly rate) from 419 unique lawyers from 84 unique cases. The lawyer-year data points spanned from years 2013 to 2020, from \$100 to \$1250, and from less than one year of experience to 58 years.
9. Paralegal/law clerk rates were also recorded. The following titles in the fee motions were included in the paralegal/law clerk data: law clerk, legal assistant, paralegal, senior legal assistant, senior paralegal, and student clerk. The paralegal/law clerk row is based on 108 paralegal-year data points from 42 unique cases. They spanned from 2013 to 2019 and from \$60 to \$290. (It is unclear how many unique persons are in the 108 data points because paralegals were not always identified by name.)
10. The matrix was created with separate regressions for the lawyer data and the paralegal data. For the paralegal data, simple linear least-squares regression was used with the dependent variable hourly rate and the independent variable the year the rate was charged subtracted from 2013; years were

combined into one variable and subtracted from 2013 rather than modeled as separate indicator variables to constrain annual inflation to a constant, positive number. The resulting regression formula was rate = 129.8789 + 9.902107 * (year-2013). For the lawyer data, least-squares regression was used with the dependent variable hourly rate and independent variables the year the rate was charged and the number of years of experience of the lawyer when the rate was charged. The year the rate was charged was subtracted from 2013 and modeled linearly as with the paralegal data. The number of years out of law school (or since year of bar passage) was modeled with both linear and squared terms, as is common in labor economics to account for non-linear wage growth (e.g., faster growth earlier in one's career than at the end of one's career). *See, e.g.*, Jacob Mincer, *Schooling, Experience, and Earnings* (1974). The resulting regression formula was rate = 227.319 + 16.54492 * experience - 0.2216217 * experience ^ 2 + 27.97634 * (year-2013). Regressions were also run with log transformed rates and with a random-effect model (to account for several lawyers appearing more than once in the data), but both alternatives resulted in mostly lower rates than those reflected here; in order to minimize fee disputes, these models were therefore rejected in favor of the more generous untransformed, fixed-effect model. Rates from one case comprised 20% of the data; the regression was also run without that case, but the resulting rates were mostly lower and therefore rejected, again to minimize fee disputes.

11. The data collected for this matrix runs through 2020. To generate rates in 2021, an inflation adjustment (rounded to the nearest whole dollar) was added. The United States Attorney's Office determined that, because courts and many parties have employed the legal services index of the Consumer Price Index to adjust attorney hourly rates for inflation, this matrix will do likewise. *E.g.*, *Salazar v. District of Columbia*, 809 F.3d 58, 64-65 (D.C. Cir. 2015); *Eley*, 793 F.3d at 101-02; *DL*, 924 F.3d at 589-90.
12. This matrix was researched and prepared by Brian Fitzpatrick, the Milton R. Underwood Chair in Free Enterprise and Professor of Law at Vanderbilt Law School, with the help of his students.

McCollough Declaration Attachment C

Databases, Tables & Calculators by Subject

Change Output Options: From: 1996 To: 2021 **GO**
 include graphs include annual averages [More Formatting Options](#) ➔

Data extracted on: December 13, 2021 (12:01:55 PM)

CPI for All Urban Consumers (CPI-U)

Series Id: CUURS35ASA0

Not Seasonally Adjusted

Series Title: All items in Washington-Arlington-Alexandria, DC-VA-MD-WV, all urban consumers, not seasonally adjusted

Area: Washington-Arlington-Alexandria, DC-VA-MD-WV

Item: All items

Base Period: 1982-84=100

Download: [!\[\]\(1d37fe9f90e68314090b436c97697f59_img.jpg\) xlsx](#)

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual	HALF1	HALF2
1996	156.8		158.4		159.0		160.1		160.8		161.2		159.6	158.3	160.8
1997	161.6		161.9		162.1		162.9		163.6		161.8		162.4	162.0	162.8
1998	162.5		163.5		163.6		164.9		165.2		164.5				
1999	165.4		165.9		167.0		168.3		169.8		169.1				
2000	169.8		173.2		172.5		174.8		175.0		175.3				
2001	175.9		177.2		178.0		179.2		180.9		179.5				
2002	180.0		181.9		183.6		184.2		185.8		185.4				
2003	186.3		188.8		188.7		190.2		190.8		190.4				
2004	190.7		192.8		194.1		195.4		196.5		197.2				
2005	198.2		200.4		201.8		202.8		205.6		204.3				
2006	205.6		206.4		209.1		211.4		211.2		210.1				
2007	211.101		214.455		216.097		217.198		218.457		218.331				
2008	220.587		222.554		224.525		228.918		228.871		223.569				
2009	221.830		222.630		223.583		226.084		227.181		226.533				
2010	227.440		228.480		228.628		228.432		230.612		230.531				
2011	232.770		235.182		237.348		238.191		238.725		238.175				
2012	238.994		242.235		242.446		241.744		244.720		243.199				
2013	243.473		245.477		245.499		246.178		247.838		247.264				
2014	247.679		249.591		250.443		250.326		250.634		249.972				
2015	247.127		249.985		251.825		250.992		252.376		251.327		250.664	249.828	251.500
2016	250.807		252.718		254.850		254.305		253.513		253.989		253.422	253.049	253.795
2017	254.495		255.435		255.502		255.518		257.816		257.872		256.221	255.332	257.110
2018	260.219		260.026		261.770		262.016		263.056		261.120		261.445	260.903	261.987
2019	262.304		264.257		265.967		265.170		265.500		265.026		264.777	264.252	265.301
2020	266.433		265.385		265.733		267.287		268.788		268.700		267.157	265.954	268.359
2021	270.535		272.347		275.822		279.099		280.933		284.240			273.603	

U.S. BUREAU OF LABOR STATISTICS Postal Square Building 2 Massachusetts Avenue NE Washington, DC 20212-0001

Telephone: 1-202-691-5200 Federal Relay Service: 1-800-877-8339 www.bls.gov [Contact Us](#)

McCollough Declaration Attachment D

Date	Biller	Description	Billed Hours	Rate	Total
Biller - W. Scott McCollough (Attorney) (WSM)					
2020					
1/17/2020	WSM	Conv w/ client re case planning and scheduling; initial research on standing issues of potential petitioners	1.0	\$214.48	\$214.48
1/17/2020	WSM	Initial research on standing issues of potential petitioners	0.6	\$214.48	\$128.69
1/19/2020	WSM	Standing and other research	0.4	\$214.48	\$85.79
1/19/2020	WSM	Conv w/ client and potential petitioner	0.3	\$214.48	\$64.34
1/19/2020	WSM	Deep dive into order to identify issues	1.0	\$214.48	\$214.48
1/19/2020	WSM	Start PFR template	0.5	\$214.48	\$107.24
1/20/2020	WSM	Conv w/ client and more potential petitioners	1.2	\$214.48	\$257.38
1/20/2020	WSM	Continue reading order and 2013 NOI	2.0	\$214.48	\$428.96
1/20/2020	WSM	Research cases on various potential issues	2.2	\$214.48	\$471.86
1/20/2021	WSM	Update status of cities' 9th Circuit case	0.3	\$214.48	\$64.34
1/20/2021	WSM	Finish and send PFR template to client	0.3	\$214.48	\$64.34
1/21/2020	WSM	Continue issues research; update client and send questions	2.0	\$214.48	\$428.96
1/22/2020	WSM	Research on Hobbs Act "aggrieved party" requirements for commenting parties; re-review FCC comments by various participants and identify potential issues	3.0	\$214.48	\$643.44
1/23/2020	WSM	Conv w/ client re task allocation and strategy	0.9	\$214.48	\$193.03
1/23/2020	WSM	Further develop strategy then make edits to draft PFR and issue/brief outline	3.0	\$214.48	\$643.44
1/24/2020	WSM	Prepare recommendation for client on petitioners and organizational alignment	0.5	\$214.48	\$107.24
1/24/2020	WSM	Add corporate disclosure statement to PFR	0.3	\$214.48	\$64.34
1/24/2020	WSM	Research on basis for organization to separately claim Art. III standing	2.0	\$214.48	\$428.96
1/26/2020	WSM	Work on affidavit templates	0.5	\$214.48	\$107.24
1/26/2020	WSM	Review client supplied materials and do followup research and analysis then report back with response on standing and substantive issues	0.9	\$214.48	\$193.03
1/26/2020	WSM	Go back through FCC comments to locate filings addressing discrete issues	1.6	\$214.48	\$343.17
1/26/2020	WSM	Read comments by potential petitioners or organization members	0.8	\$214.48	\$171.58
1/26/2020	WSM	Pull affidavits from 9th Cir. Greenlining case to find deficiencies identified by the court	0.3	\$214.48	\$64.34
1/26/2020	WSM	Conf call with potential petitioner	0.2	\$214.48	\$42.90
1/27/2020	WSM	Draft engagement letter for individual petitioners; multiple convs w/ client	2.4	\$214.48	\$514.75
1/28/2020	WSM	Edit PFR; fill in names/addresses	0.8	\$214.48	\$171.58

Date	Biller	Description	Billed Hours	Rate	Total
1/28/2021	WSM	Send PFR edits with names and addresses added to client; conv w/ client	0.8	\$214.48	\$171.58
1/29/2020	WSM	Continue with PFR	0.7	\$214.48	\$150.14
1/29/2020	WSM	Convs w/ multiple clients re status and process	3.3	\$214.48	\$707.78
1/30/2020	WSM	Further edits to PFR	0.7	\$214.48	\$150.14
1/30/2020	WSM	Discussion w/ clients regarding named plaintiffs or part of organizational standing	0.7	\$214.48	\$150.14
1/31/2020	WSM	Semi-final edits to PFR; send to client	2.0	\$214.48	\$428.96
2/1/2020	WSM	Work with client to reach PFR final clean; distribute	1.0	\$214.48	\$214.48
2/2/2020	WSM	Finish and upload PFR to 9th Circuit (new agency case with fee)	2.0	\$214.48	\$428.96
2/3/2020	WSM	Conv w/ client re PFR, other PFRs and what happens from here	0.8	\$214.48	\$171.58
2/5/2020	WSM	Start client instruction package for standing showing; send then cloud share with clients	3.2	\$214.48	\$686.34
2/6/2020	WSM	Hobbs Act research - premature and cure	0.5	\$214.48	\$107.24
2/6/2020	WSM	Research on scope of review for NOI	2.0	\$214.48	\$428.96
2/6/2020	WSM	Fill out 9th Cir mediation questionairre for Monday filing	0.5	\$214.48	\$107.24
2/7/2020	WSM	Conv w/ client re all upcoming tasks and strategy	0.7	\$214.48	\$150.14
2/8/2020	WSM	Conv w/ client re strategy	0.3	\$214.48	\$64.34
2/8/2020	WSM	Upload Mediation Questionairre to 9th Cir. ECF	0.2	\$214.48	\$42.90
2/10/2020	WSM	Review FDA determination, research FDA organization and jurisdictional issues and determine strategy re same	1.5	\$214.48	\$321.72
2/17/2020	WSM	Resume working on standing affidavit needs	1.0	\$214.48	\$214.48
2/17/2020	WSM	Start outlining potential additional legal arguments (delegation, APA)	0.8	\$214.48	\$171.58
2/17/2020	WSM	Pull down and read all past FCC orders on RF emissions rule starting in 1972	3.4	\$214.48	\$729.23
2/24/2020	WSM	Review Mary Adkins Affidavit	1.0	\$214.48	\$214.48
2/24/2020	WSM	Convs w/ client re Standing necessities and outlines	0.3	\$214.48	\$64.34
2/25/2020	WSM	Review Adkins and McMahon Affidavits and exhibits; convs w/ client re same and further requirements	3.6	\$214.48	\$772.13
2/28/2020	WSM	Convs w/ client re additional standing affidavit requirements	1.3	\$214.48	\$278.82
3/1/2020	WSM	Convs w/ client; review affidavits and send comments to clients	3.0	\$214.48	\$643.44
3/2/2020	WSM	Review additional affidavits	3.0	\$214.48	\$643.44
3/3/2020	WSM	Conv w/ client re status	0.2	\$214.48	\$42.90
3/4/2020	WSM	Finish Stanley and Dart affidavit review and send comments to clients	4.0	\$214.48	\$857.92
3/5/2020	WSM	Review Stanley, Gallo, Farver, Morrison affidavits and comment; convs w/ client	2.8	\$214.48	\$600.54

Date	Biller	Description	Billed Hours	Rate	Total
3/6/2020	WSM	Review revised Farver and Morrison affidavits and send comments to client	2.8	\$214.48	\$600.54
3/6/2020	WSM	Download EHT filings in DC Cir. for analysis and transmittal to client with comments	1.2	\$214.48	\$257.38
3/7/2020	WSM	Review Gallo affidavit; send comments to client	3.0	\$214.48	\$643.44
3/8/2020	WSM	Gallo and Morrison affidavit review after client edits then send comments to clients	1.8	\$214.48	\$386.06
3/9/2020	WSM	Adkins, Hertz and Farver Affidavit review; convs w/ clients re same	4.2	\$214.48	\$900.82
3/11/2020	WSM	Receive Adkins second set of hard and soft copy documents; begin reviewing and commenting on current affidavit text	1.2	\$214.48	\$257.38
3/12/2020	WSM	Convs w/ client; continue with affidavits	1.0	\$214.48	\$214.48
3/15/2020	WSM	Finish final review of Adkins affidavit and send comments to witness	2.0	\$214.48	\$428.96
3/16/2020	WSM	Continue with latest affidavit edit rounds; Baran; Jelter; Gallo; help fill record cites	3.0	\$214.48	\$643.44
3/17/2020	WSM	Review Jelter affidavit; help fill holes; send comments	1.8	\$214.48	\$386.06
3/18/2020	WSM	Review Adkins, Baran and Dart affidavits and send comments back to clients	3.0	\$214.48	\$643.44
3/20/2020	WSM	Finish Adkins affidavit rewrite and send comments to witness	1.5	\$214.48	\$321.72
3/23/2020	WSM	Download and analyze FCC Record Index filing in DC Cir; conv w/ client w/ report	1.0	\$214.48	\$214.48
3/29/1930	WSM	Final review Adkins, Ann Lee and David Morrison affidavits	1.5	\$214.48	\$321.72
3/31/2020	WSM	Find and forward advance FR publication notice of FCC RF order; explain meaning and process going forward to client; start amended PFR	2.5	\$214.48	\$536.20
4/1/2020	WSM	Pull down formal FedReg publication; work on supplemental PFR	2.3	\$214.48	\$493.30
4/1/2020	WSM	Get affidavits (Hertz, Tsiang, Baran) in final form	1.7	\$214.48	\$364.62
4/2/2020	WSM	Work on Adkins affidavit	1.0	\$214.48	\$214.48
4/2/2020	WSM	Edit/Finish Supplemental PFR and receive client input; upload to ECF; serve FCC by email;	2.8	\$214.48	\$600.54
4/6/2020	WSM	Check EHT case for any recent filings and status ; report to client	0.3	\$214.48	\$64.34
4/6/2020	WSM	Re-send email to FCC GC seeking acknowledgement of service	0.1	\$214.48	\$21.45
4/9/2020	WSM	Prepare briefing template and start inserting text on base topics; send to client	2.8	\$214.48	\$600.54
4/10/2020	WSM	Draft brief boilerplate material	1.0	\$214.48	\$214.48

Date	Biller	Description	Billed Hours	Rate	Total
4/11/2020	WSM	Conv w/ client re assignment of briefing tasks and status; draft tasking memo on ECFS search method and search terms	0.6	\$214.48	\$128.69
4/11/2020	WSM	Draft tasking memo on ECFS search method and search terms	0.6	\$214.48	\$128.69
4/12/2020	WSM	Call w/ client team re ECFS search for brief/record items; allocate search terms into categories and distribute; comment on preliminary analytical/results spreadsheet template	1.6	\$214.48	\$343.17
4/12/2020	WSM	Continue working on background and history portion of brief	3.5	\$214.48	\$750.68
4/13/2020	WSM	Finish review of Brokken, Dart and Lee affidavits	1.5	\$214.48	\$321.72
4/18/2020	WSM	Continue on basic briefing contents	1.2	\$214.48	\$257.38
4/18/2020	WSM	Discuss affidavits and briefing status	0.4	\$214.48	\$85.79
4/20/2020	WSM	Discussion with client experts re OET 56 and 65	1.0	\$214.48	\$214.48
4/20/2020	WSM	Work on brief; identify potential procedural issues	2.5	\$214.48	\$536.20
4/22/2020	WSM	Research precautionary principle; review comments at FCC on issue and review DC Cir precedent	1.5	\$214.48	\$321.72
4/23/2020	WSM	Locate FDA policy and rules for extrapolation from animal studies to effects on humans; add results to brief	3.5	\$214.48	\$750.68
4/24/2020	WSM	Continue finding/pulling cases and adding to brief in appropriate topic areas with discussion/analysis	3.2	\$214.48	\$686.34
4/24/2020	WSM	Briefing and analysis - science and biological response	2.3	\$214.48	\$493.30
4/25/2020	WSM	Discuss case status and receive directions on DC Cir case consolidation, timing, briefing and cooperation with EHT	0.7	\$214.48	\$150.14
4/24/2020	WSM	Return to brief drafting	2.0	\$214.48	\$428.96
4/27/2020	WSM	Conf call w/ EHT counsel re consolidation, scheduling and briefing; report to client; compose email on potential meeting with EHT	1.0	\$214.48	\$214.48
4/28/2020	WSM	Conv w/ client; final affidavit comments to Dart and Farver	1.8	\$214.48	\$386.06
4/29/2020	WSM	Continue with final work on affidavits	2.0	\$214.48	\$428.96
4/29/2020	WSM	Work on issue splitting with EHT	0.5	\$214.48	\$107.24

Date	Biller	Description	Billed Hours	Rate	Total
4/30/2020	WSM	Prepare initial filings (docketing statement, deferred appendix statement; statement of parties, rulings and cases; preliminary statement of issues); create Case Caption for our own Case No. filings	3.0	\$214.48	\$643.44
5/1/2020	WSM	Final review current affidavits before execution	0.6	\$214.48	\$128.69
5/1/2020	WSM	Conv w/ EHT and FCC counsel re consolidated case schedule	0.5	\$214.48	\$107.24
5/1/2020	WSM	Continue on initial procedural filings	1.8	\$214.48	\$386.06
5/4/2020	WSM	Convs w/ FCC and EHT counsel and w/ DC Cir Clerk re events and scheduling; draft motion to amend schedule	1.2	\$214.48	\$257.38
5/4/2020	WSM	Convs w/ client; further map out briefing issues	0.4	\$214.48	\$85.79
5/4/2020	WSM	Research potential new point of error (FCC relied on non-record evidence) and incorporate into briefing template	1.4	\$214.48	\$300.27
5/5/2020	WSM	Conv w/ EHT counsel; work on briefing organization; conv w/ client; work on table of issues for splitting between EHT/CHD and send to client for markup	3.2	\$214.48	\$686.34
5/6/2020	WSM	Finish table of issues and proposed CHD/EHT allocation then send to EHT	0.5	\$214.48	\$107.24
5/6/2020	WSM	Finish and file motion to amend schedule	0.7	\$214.48	\$150.14
5/7/2020	WSM	Conv w/ client; do explainer on how briefing works in DC Cir and provide example	0.5	\$214.48	\$107.24
5/7/2020	WSM	Finish Adkins affidavit and send to witness for execution and return	0.3	\$214.48	\$64.34
5/7/2020	WSM	Receive Elliott and Morrison executed affidavits, scan and OCR then send copy to client	0.2	\$214.48	\$42.90
5/8/2020	WSM	Deal with CHD/EHT briefing allocation issues; review EHT proposal and draft response; multiple conversations and email exchanges with client over same	4.0	\$214.48	\$857.92
5/11/2020	WSM	Work on inter-petitioner issues; convs w/ client; go into brief template and begin organization and issue statement consistent with tentative issue division and current theory of case; send to client; calls to prepare for 5/12 substantive call with EHT	3.2	\$214.48	\$686.34
5/12/2020	WSM	Prepare for and do conf call w/ EHT; report to client; draft follow up email to EHT counsel	1.5	\$214.48	\$321.72

Date	Biller	Description	Billed Hours	Rate	Total
5/13/2020	WSM	Follow up conf call w/ EHT re issue allocation and brief milestones; memorialize same; implement results into task table and distribute; review proposed brief outline and send comments; pull case on sub-delegation and send to EHT	1.2	\$214.48	\$257.38
5/13/2020	WSM	Identify best contextual precedent on examples of arbitrary/capricious/abuse of discretion/substantial evidence	2.0	\$214.48	\$428.96
5/15/2020	WSM	Draft email to EHT counsel for client review and approval	0.2	\$214.48	\$42.90
5/16/2020	WSM	Update issue allocation table; assign substantial evidence/agency record research to Paralegal	1.1	\$214.48	\$235.93
5/16/2020	WSM	Provide client primer on Ad law principles regarding arbitrary/capricious/abuse of discretion/substantial evidence/reasoned decisionmaking	2.9	\$214.48	\$621.99
5/17/2020	WSM	Finish emails to EHT counsel and send to client for approval; receive instructions and send	0.7	\$214.48	\$150.14
5/17/2020	WSM	Work on agency record research coordination and review current internal results for brief writing on CHD-assigned issues	2.3	\$214.48	\$493.30
5/18/2020	WSM	Finish CHD insert for Standard of Review in brief and send to EHT	0.4	\$214.48	\$85.79
5/18/2020	WSM	Work on CHD-assigned briefing issues - bring in prior work product	3.0	\$214.48	\$643.44
5/19/2020	WSM	Coordinate and continue work on FCC emissions science and history	1.9	\$214.48	\$407.51
5/19/2020	WSM	Communicate w/ EHT counsel on briefing case and record citation conventions	0.2	\$214.48	\$42.90
5/27/2020	WSM	Work on briefing; research/shepardize ComAct decisions	1.3	\$214.48	\$278.82
5/27/2020	WSM	Help client with science portion write-up	1.8	\$214.48	\$386.06
5/27/2020	WSM	Start review of Carpenter affidavit draft	1.0	\$214.48	\$214.48
5/29/2020	WSM	Continue Carpenter affidavit review; send to legal assistant for grammar and language and organization suggestions	1.5	\$214.48	\$321.72
6/3/2020	WSM	Do Zoom call with all Petitioners; post conf conv w/ client re same and brief status/planning	1.8	\$214.48	\$386.06
6/4/2020	WSM	Organize and finalize executed affidavits; review client affidavit	2.3	\$214.48	\$493.30
6/4/2020	WSM	Conf call with email from EHT counsel	0.4	\$214.48	\$85.79
6/4/2020	WSM	Work on brief - CHD-assigned issues	3.1	\$214.48	\$664.89

Date	Biller	Description	Billed Hours	Rate	Total
6/5/2020	WSM	Convs w/ EHT counsel re schedule and brief word limit; conv w/ FCC counsel re same; report to client	1.5	\$214.48	\$321.72
6/5/2020	WSM	Finish review/edit client affidavit	3.3	\$214.48	\$707.78
6/6/2020	WSM	Draft request for 2nd extension and send to EHT counsel for review	0.7	\$214.48	\$150.14
6/6/2020	WSM	Work on Carpenter affidavit and merits brief	3.3	\$214.48	\$707.78
6/7/2020	WSM	Finish and circulate 2nd extension draft; review EHT-drafted word expansion motion	1.0	\$214.48	\$214.48
6/7/2020	WSM	Continue with Carpenter affidavit and merits brief	5.0	\$214.48	\$1,072.40
6/8/2020	WSM	Negotiate and secure 2nd extenstion agreement, then file; participate in word expansion motion discussions	1.0	\$214.48	\$214.48
6/8/2020	WSM	Continue with Carpenter affidavit and merits brief	4.5	\$214.48	\$965.16
6/10/2020	WSM	Start editing/adding to brief Standing argument	2.8	\$214.48	\$600.54
6/11/2020	WSM	Continue w/ Standing argument; work on statutory claims piece	4.8	\$214.48	\$1,029.50
6/13/2020	WSM	Integrate all briefing topics into agreed outline; do edits; further research on specific issues and include findings; begin reorganization	5.2	\$214.48	\$1,115.30
6/15/2020	WSM	Begin integrating client-supplied microwave sickness document into template and statement of the case; find cases and citations to authority	4.0	\$214.48	\$857.92
6/16/2020	WSM	Continue integrating client-supplied document into statement of the case with edits and size reductions; merge other case statement portions then drop into EHT outline; begin editing for consistent terminology. Send to client as status update	5.5	\$214.48	\$1,179.64
6/17/2020	WSM	Continue with briefing; do more topic inserts; edit; locate record citations and count number of comments on various topics	3.5	\$214.48	\$750.68
6/18/2020	WSM	Review DACA opinion for overlapping APA issues; continue editing brief	4.0	\$214.48	\$857.92
6/19/2020	WSM	Continue working on brief; integrating new parts from client; editing; finding record and case citations	3.0	\$214.48	\$643.44
6/20/2020	WSM	Another brief editing round to cut words	2.0	\$214.48	\$428.96
6/22/2020	WSM	Finish reorganized Carpenter review and send comments to client; add more record citations to brief	2.2	\$214.48	\$471.86
6/23/2020	WSM	Conv w/ client; corresp w/ EHT counsel re allocation of additional tasks (rule history, glossary); work on various parts of brief	2.8	\$214.48	\$600.54

Date	Biller	Description	Billed Hours	Rate	Total
6/23/2020	WSM	Convs w/ client re brief; continue work on CHD-assigned portions	1.0	\$214.48	\$214.48
6/25/2020	WSM	Grammar check brief; deep rhetorical style editing	1.5	\$214.48	\$321.72
6/27/2020	WSM	Convs w/ client re glossary, foreign decisions, overall status; work on briefing issues and organization, continued editing	2.5	\$214.48	\$536.20
6/29/2020	WSM	Work on doctors' standing argument after review latest S.Ct. decision on 3rd party standing; continue editing brief based on recent strategic decisions and ongoing research; continue grammar/word count scrub	3.0	\$214.48	\$643.44
6/30/2020	WSM	Edit client supplied ICNIRP material; prepare to insert in brief; convs w/ client re various issues	3.8	\$214.48	\$815.02
7/1/2020	WSM	Conv w/ court clerk re schedule/volume motions; report to client; discuss briefing status and timing	0.7	\$214.48	\$150.14
7/1/2020	WSM	Read new court case on standing and incorporate into brief; continue inserting client-supplied material in brief	3.8	\$214.48	\$815.02
7/2/2020	WSM	Review scheduling/volume order and calendar; report to client	0.3	\$214.48	\$64.34
7/2/2020	WSM	Tighten argument on lack of reasoned decisionmaking	1.7	\$214.48	\$364.62
7/3/2020	WSM	Coordinate with client and EHT counsel on planning	0.4	\$214.48	\$85.79
7/3/2020	WSM	Work on brief	5.6	\$214.48	\$1,201.09
7/4/2020	WSM	Continue working on brief	3.8	\$214.48	\$815.02
7/5/2020	WSM	Insert client-supplied mechanism of harm discussion; fill citation holes	2.0	\$214.48	\$428.96
7/6/2020	WSM	Continue working on brief	3.0	\$214.48	\$643.44
7/7/2020	WSM	Continue inserting more client-supplied material into brief; work on professional injury standing portion	6.0	\$214.48	\$1,286.88
7/8/2020	WSM	Merge client-supplied and self-generated technical discussion and rule description; convs w/ client; start moving client edits into brief; conceive how to reorg all material	5.8	\$214.48	\$1,243.98
7/9/2020	WSM	Finish merger and do reorg with further edits; send link to client	7.0	\$214.48	\$1,501.36
7/10/2020	WSM	Continue editing; collaborative editing/drafting work w/ client on technical concepts; further reorg	6.0	\$214.48	\$1,286.88
7/11/2020	WSM	Conv w/ client; continue editing; research terminology and linguistics differences between scientists and FCC engineers/rules/decisions	3.2	\$214.48	\$686.34

Date	Biller	Description	Billed Hours	Rate	Total
7/12/2020	WSM	Conv w/ engineer expert; conv w/ client; rework narrative; continue editing brief; find FCC statutory authority over EMF (as distinguished from RF)	2.5	\$214.48	\$536.20
7/13/2020	WSM	Do another merger of client product; finish backend; convs w/ client	10.0	\$214.48	\$2,144.80
7/14/2020	WSM	Finish draft and prepare for transmittal to EHT; convs w/ client; receive other petitioners' draft and start initial review	3.8	\$214.48	\$815.02
7/15/2020	WSM	Conv w/ client; review other petitioners' drafts; conv w/ engineering expert	2.0	\$214.48	\$428.96
7/16/2020	WSM	Conf w/ all petitioner counsel; convs w/ client; begin suggested breakout of our brief into overall combined brief organization	3.0	\$214.48	\$643.44
7/20/2020	WSM	Receive consolidated brief from other petitioners' counsel; begin review and edit	1.8	\$214.48	\$386.06
7/21/2020	WSM	Work on editing consolidated brief; locate redundant parts, move, cut 4,200 words; convs w/ client and EHT counsel	8.0	\$214.48	\$1,715.84
7/22/2020	WSM	Continue edits and make significant volume reductions; convs w/ client and EHT counsel re brief	7.8	\$214.48	\$1,672.94
7/23/2020	WSM	Finish CHD edits and send to other petitioners' counsel; review client edits and merge; convs w/ client	6.0	\$214.48	\$1,286.88
7/24/2020	WSM	Start negotiations for merged brief; edit sections and agree to others	5.2	\$214.48	\$1,115.30
7/24/2020	WSM	Review DT affidavit and send edits/comments	2.8	\$214.48	\$600.54
7/25/2020	WSM	Negotiate additional brief portions; do next round of edits to each of our sections for volume reduction; start editing legal section for volume reduction; convs w/ client	12.0	\$214.48	\$2,573.76
7/26/2020	WSM	Continue negotiating final language; receive input from client; pass on proposed edits to EHT; edit our own language for further reductions	12.0	\$214.48	\$2,573.76
7/27/2020	WSM	Establish path forward given volume requirements; begin edits to new master - submit serial edits; convs w/ client	5.5	\$214.48	\$1,179.64
7/27/2020	WSM	Work on affidavits	1.5	\$214.48	\$321.72
7/28/2020 - 7/29/2020	WSM	Work straight through 8 am 7/28 - 11 pm 7/29; finish brief, including addendum and standing materials; convs w/ client and EHT; final drafting and approval (39 hours total charge only 24)	24.0	\$214.48	\$5,147.52
7/30/2020	WSM	Review filed brief and send conclusions to client	1.5	\$214.48	\$321.72

Date	Biller	Description	Billed Hours	Rate	Total
8/1/2020	WSM	Implement brief error correction from 3 sources; send to client	3.0	\$214.48	\$643.44
8/3/2020	WSM	Review Clerk Acronyms letter; convs w/ client and EHT	0.5	\$214.48	\$107.24
8/4/2020	WSM	Conv w/ EHT re corrected brief; report to client	0.6	\$214.48	\$128.69
8/5/2020	WSM	Continue efforts to make error corrections; convs w/ client; finish document and send to other petitioners with note	4.2	\$214.48	\$900.82
8/5/2020	WSM	Edit URL spreadsheet for FCC and send to client	1.3	\$214.48	\$278.82
8/6/2020	WSM	Continue efforts to make error corrections; convs w/ client; conv w/ other petitioners	2.0	\$214.48	\$428.96
8/12/2020	WSM	Work on corrected brief; convs w/ client and other petitioners	4.0	\$214.48	\$857.92
8/13/2020	WSM	Finish corrected brief and URL Table; send to other petitioners, client and FCC for review	3.2	\$214.48	\$686.34
8/17/2020	WSM	Negotiate revised briefing schedule	0.2	\$214.48	\$42.90
9/2/2020	WSM	Work with client on JA material compilation and creation/ordering	1.2	\$214.48	\$257.38
9/10/2020	WSM	Develop proposed timeline for remaining activities for client comment and ultimate exchange with EHT	1.0	\$214.48	\$214.48
9/14/2020	WSM	Convs w/ client and conv w/ EHT counsel re reply briefing	1.2	\$214.48	\$257.38
9/17/2020	WSM	Work on JA development issues	1.8	\$214.48	\$386.06
9/21/2020	WSM	Internal client group meeting to prepare for FCC brief	0.4	\$214.48	\$85.79
9/22/2020	WSM	Receive, distribute and do 1st review of FCC brief and provide 1st thoughts to client	2.6	\$214.48	\$557.65
9/23/2020	WSM	Develop rough outline and workplan/schedule for reply brief and send to client; begin legal research on APA/reasoned decisionmaking issues	6.0	\$214.48	\$1,286.88
9/24/2020	WSM	Work on joint plan of action and start brief drafting	4.3	\$214.48	\$926.55
9/28/2020	WSM	Re-read FCC brief; do legal research	1.8	\$214.48	\$386.06
9/29/2020	WSM	Work on brief organization and topics; compile cited case summaries and points to use them for; work on legal issues portion; start editing client's ICNIRP rebuttal	4.0	\$214.48	\$857.92
9/30/2020	WSM	Continue work on brief all issues	4.0	\$214.48	\$857.92
10/1/2020	WSM	Work on reply brief; edit/include client-drafted portions	3.3	\$214.48	\$707.78
10/2/2020	WSM	Finish edits to client drafted portion, await more client materials; edit various legal and specific issue portions; send to client	7.0	\$214.48	\$1,501.36

Date	Biller	Description	Billed Hours	Rate	Total
10/4/2020	WSM	Continue editing client-supplied material; send back to client for record cite hole-filling; draft portion on requirement that FCC order be based only on record evidence	7.8	\$214.48	\$1,672.94
10/5/2020	WSM	Finish all CHD parts; work with client to fill holes; merge into single document; send to EHT; start on master brief template	5.0	\$214.48	\$1,072.40
10/6/2020	WSM	Continue editing brief; legal analysis	7.0	\$214.48	\$1,501.36
10/7/2020	WSM	Continue with brief; receive EHT partial material and work into master	5.0	\$214.48	\$1,072.40
10/8/2020	WSM	Continue with brief	7.8	\$214.48	\$1,672.94
10/9/2020	WSM	Continue with brief; all portions	7.0	\$214.48	\$1,501.36
10/10/2020	WSM	Review EHT-supplied material; confer w/ client; combine EHT material and put in cloud to share with client; further reduce volume of CHD material	8.8	\$214.48	\$1,887.42
10/11/2020	WSM	Confer w/ EHT; first run edits and preparation of EHT product for assimilation into combined master; work w/ client re various issues; review Italy court quotes re ICNIRP	9.0	\$214.48	\$1,930.32
10/12/2020	WSM	Work on Master v1 and v2; send updates to client; talk to Italian attorney re court decisions	10.5	\$214.48	\$2,252.04
10/13/2020	WSM	Work on Master v3 and 3.1; negotiate 3 day extension; bring in EHT part III edits; discuss overall flow and structure with client; insert client supplied v3 edits into 3.1; prepare to do reorg and Italy cases insert	10.0	\$214.48	\$2,144.80
10/14/2020	WSM	Do v4 then reorg v.1; send to client	9.0	\$214.48	\$1,930.32
10/15/2020	WSM	Massive re-re org, put in master shell; start on significant volume reductions; start on table of contents and index coding; start authorities addendum	10.8	\$214.48	\$2,316.38
10/16/2020	WSM	Finish coding; do client edits; distribute to EHT; do own editing; finish statutory authorities addendum, including bringing in Italian cases/certs	9.2	\$214.48	\$1,973.22
10/17/2020	WSM	Continue editing - input all comments by reviewers and client; input EHT changes; distribute	10.0	\$214.48	\$2,144.80
10/18/2020	WSM	Continue editing; cut 1000 words and do wordsmithing for narrative; work with client on final substantive issues; deliver semi-final to client and EHT	11.0	\$214.48	\$2,359.28
10/19/2020	WSM	Finish coordinating edits to brief; create final version and upload	9.0	\$214.48	\$1,930.32

Date	Biller	Description	Billed Hours	Rate	Total
10/20/2020	WSM	Begin work on JA; conv w/ client group to organize effort; send email to FCC counsel regarding one FCC designation not in ECFS	3.0	\$214.48	\$643.44
10/23/2020	WSM	Work with client team on JA	1.5	\$214.48	\$321.72
10/24/2020	WSM	Work with team on JA issues	1.2	\$214.48	\$257.38
10/25/2020	WSM	Work with team on JA issues	1.2	\$214.48	\$257.38
10/26/2020	WSM	Negotiate, prepare and file consent motion to extend JA filing	1.0	\$214.48	\$214.48
11/2/2020	WSM	Work on JA and Index; share with FCC and EHT; status to client group	5.0	\$214.48	\$1,072.40
11/3/2020	WSM	Continue on JA; break into 25 volumes; work with client group on JA and index	6.5	\$214.48	\$1,394.12
11/4/2020	WSM	Finish JA and upload to ECF; download PACER version and distribute through Dropbox	6.8	\$214.48	\$1,458.46
11/9/2020	WSM	Work on fixing JA issues; create supplement JA with 2 items; conv w/ EHT counsel; conv w/ client	2.5	\$214.48	\$536.20
11/10/2020	WSM	Work on bringing JA cites into both briefs (final briefs); re-do table of contents and index of authorities into final initial	8.8	\$214.48	\$1,887.42
11/11/2020	WSM	Finish both final briefs and distribute; work on addenda	8.5	\$214.48	\$1,823.08
11/12/2020	WSM	Finish final briefs; finish both statutory addenda; upload to ECF; download from PACER and send to client	6.0	\$214.48	\$1,286.88
11/13/2020	WSM	Finish preparing, upload and distribute corrected JA Vols 8 and 19; Finish preparing, upload and distribute Suppl JA Vol 27; oversee pick up and delivery for shipping	3.2	\$214.48	\$686.34
11/19/2020	WSM	Get Suppl. JA and Final Briefs (w/ Addenda) reproduction ready; verify all is correct, oversee shipping	1.5	\$214.48	\$321.72
11/20/2020	WSM	Draft motion for leave to file Suppl JA; circulate to parties; file with court	1.5	\$214.48	\$321.72
11/30/2020	WSM	Discussion w/ client re case and argument planning; quick research on audio vs. video argument issues	0.8	\$214.48	\$171.58
12/17/2020	WSM	Gather materials for moot court panel, do summary of issues; work with client and other petitioners on oral argument motion	2.8	\$214.48	\$600.54
12/18/2020	WSM	Continue gathering materials for moot court; start working on moot draft argument	3.0	\$214.48	\$643.44
12/19/2020	WSM	Review all main cases for oral arg prep	4.0	\$214.48	\$857.92
12/20/2020	WSM	Finish prep for first moot prep meeting; do first moot prep meeting	6.0	\$214.48	\$1,286.88

Date	Biller	Description	Billed Hours	Rate	Total
12/29/2020	WSM	Get panel makeup; do panel research - obtain and begin reading all adlaw and related issues decisions each member; work on argument - thematic ideas and rhetorical approach	2.5	\$214.48	\$536.20
12/31/2020	WSM	Prep for mock argument; further panel research	3.8	\$214.48	\$815.02
2021					
1/2/2021	WSM	Work up questions for moot panel; continue with argument prep; assimilate and add to agencies summary	3.5	\$219.65	\$768.78
1/3/2021	WSM	Continue with argument prep	4.8	\$219.65	\$1,054.32
1/4/2021	WSM	Finish prep for and then do practice argument w/ moot panel	5.5	\$219.65	\$1,208.08
1/13/2021	WSM	Conv w/ clients - oral arg moot debrief, planning	3.0	\$219.65	\$658.95
1/14/2021	WSM	Continue with argument prep; review client-supplied information; convs w/ client	2.8	\$219.65	\$615.02
1/15/2021	WSM	Receive court argument orders; convs w/ client; conv w/ EHT counsel; report to client	2.2	\$219.65	\$483.23
1/17/2021	WSM	Pick back up with oral argument prep; conv w/ EHT counsel; receive information and potential demonstratives from client; review client supplied "agencies" and "science" summaries	4.8	\$219.65	\$1,054.32
1/18/2021	WSM	Review client materials on anticipated panel questions; develop answers	3.5	\$219.65	\$768.78
1/19/2021	WSM	Create and file demonstrative exhibit; continue preparing argument script	4.4	\$219.65	\$966.46
1/20/2021	WSM	Start developing combined (all petitioners') oral argument; do record research; send 1st rough to client and EHT	4.6	\$219.65	\$1,010.39
1/21/2021	WSM	Start on briefing book; organize materials; multiple editing rounds on script; convs w/ client	3.8	\$219.65	\$834.67
1/22/2021	WSM	Continue argument prep; do crib sheets and lists; do court-sponsored training session for Zoom; do another practice run	8.5	\$219.65	\$1,867.03
1/23/2021	WSM	Build briefing books; continue memorizing cases/studies/briefs; convs w/ client	10.0	\$219.65	\$2,196.50
1/24/2021	WSM	Finish day before preparation all things	10.0	\$219.65	\$2,196.50
1/25/2021	WSM	Do argument; debriefs; start working on supplemental filing	4.8	\$219.65	\$1,054.32
1/26/2021	WSM	Work on post-argument submittal re two committees; review FCC post-argument submittal; research FDA rules	3.0	\$219.65	\$658.95
1/27/2021	WSM	Work with EHT counsel re post-argument submission	2.0	\$219.65	\$439.30

Date	Biller	Description	Billed Hours	Rate	Total
8/13/2021	WSM	Receive, analyze and explain panel opinion to clients	4.0	\$219.65	\$878.60
		2020 Subtotal - WSM	707.5	\$214.48	\$151,748.89
		2021 Subtotal - WSM	85.2	\$219.65	\$18,714.18
		2020 and 2021 - WSM	792.7		\$170,463.07

Biller - Pandy Shen (Paralegal) (PS)

5/29/2020	PS	Pandy Shen Task 1: FCC Search, Record Question Research	7.5	\$60.00	\$450.00
5/30/2020	PS	Pandy Shen- research on extra-record evidence precedent	7.5	\$60.00	\$450.00
6/2/2020	PS	- extra-record ev. rule memo	5.0	\$60.00	\$300.00
6/3/2020	PS	-review draft Carpenter affidavit	2.9	\$60.00	\$300.00
6/4/2020	PS	- read through other source materials (CHD initial brief template) - work on Carpenter affidavit	7.8	\$60.00	\$465.00
6/8/2020	PS	- read through other source materials (CHD initial brief template,CHD inserts using draft briefing structure, client microwave sickness)	1.0	\$60.00	\$60.00
6/10/2020	PS	- review Carpenter affidavit - read through other source materials (CHD initial brief template, CHD inserts using draft briefing structure, client microwave sickness)	12.8	\$60.00	\$765.00
6/13/2020	PS	- look over and incorporate client edits to Carpenter affidavit - review for cases cited in Carpenter affidavit	3.0	\$60.00	\$180.00
6/15/2020	PS	- look and incorporate client edits - exhibit for cases cited in Carpenter affidavit	4.0	\$60.00	\$240.00
6/16/2020	PS	- continue work on Carpenter affidavit, incorporate client's edits - exhibit for cases cited in Carpenter affidavit	4.2	\$60.00	\$255.00
6/18/2020	PS	- continue work on Carpenter affidavit, incorporate client's edits - exhibit for cases cited in Carpenter affidavit	5.5	\$60.00	\$330.00
6/20/2020	PS	- look over and insert client edits to Carpenter affidavit-exhibit for cases cited in Carpenter affidavit	4.0	\$60.00	\$240.00
6/21/2020	PS	- continue work on Carpenter affidavit, incorporate client's edits - exhibit for cases cited in Carpenter affidavit	7.0	\$60.00	\$420.00
7/21/2020	PS	- finish reading joint brief - flag redundancies - start cutting down & editing our sections	8.8	\$60.00	\$528.00
7/21/2020	PS	- flag redundancies in joint brief - cut down & edit our sections	6.5	\$60.00	\$390.00
7/25/2020	PS	- second pass brief editing (grammar-only)	8.5	\$60.00	\$510.00
7/26/2020	PS	- citing to standing affidavits for standing	10.5	\$60.00	\$630.00

Date	Biller	Description	Billed Hours	Rate	Total
7/27/2020	PS	- continue editing and filling holes in master brief	1.0	\$60.00	\$60.00
7/28/2020	PS	- grammar edits to brief (7-27 master & new 7-28 master)	7.0	\$60.00	\$420.00
7/30/2020	PS	- review brief & check for empty citations	6.0	\$60.00	\$360.00
8/25/2020	PS	-Pull docs for JA	1.0	\$60.00	\$60.00
8/28/2020	PS	-Pull docs for JA	1.0	\$60.00	\$60.00
8/29/2020	PS	-Pull docs for JA	1.0	\$60.00	\$60.00
8/30/2020	PS	-Pull docs for JA	1.0	\$60.00	\$60.00
9/1/2020	PS	-Pull docs for JA	0.7	\$60.00	\$42.00
9/9/2020	PS	- discuss with client re JA and look over google sheets she sent over	0.5	\$60.00	\$30.00
9/11/2020	PS	- discuss with client re JA and look over google sheets she sent over - start inputting footnotes -Pull docs for JA	0.5	\$60.00	\$30.00
9/12/2020	PS	- start inputting footnotes -Pull docs for JA	8.8	\$60.00	\$528.00
9/14/2020	PS	- finish inputting footnotes into database	8.2	\$60.00	\$492.00
9/20/2020	PS	- follow up with client to check in - enter filing links into database	4.2	\$60.00	\$252.00
9/21/2020	PS	- enter filing links into database	6.5	\$60.00	\$390.00
9/22/2020	PS	- enter filing links into database	3.0	\$60.00	\$180.00
9/23/2020	PS	- enter filing links into database	3.0	\$60.00	\$180.00
9/24/2020	PS	- enter filing links into database - phone call with WSM for next tasks - pull FCC brief cases for WSM	0.5	\$60.00	\$30.00
9/25/2020	PS	- enter filing links into database - read FCC brief - pull FCC brief cases for WSM	3.0	\$60.00	\$180.00
9/26/2020	PS	- enter filing links into database - finish pulling FCC brief cases for WSM	2.0	\$60.00	\$120.00
9/27/2020	PS	- enter filing links into database	1.0	\$60.00	\$60.00
10/1/2020	PS	- enter filing links into database	9.0	\$60.00	\$540.00
10/2/2020	PS	- enter filing links into database	7.8	\$60.00	\$468.00
10/23/2020	PS	JA: - make cover pages - download evidence	0.5	\$60.00	\$30.00
10/24/2020	PS	JA: - make cover pages - download evidence	3.0	\$60.00	\$180.00
10/25/2020	PS	JA: - make cover pages - download evidence	8.2	\$60.00	\$492.00
10/26/2020	PS	JA: - make cover pages - download evidence	5.5	\$60.00	\$330.00

Date	Biller	Description	Billed Hours	Rate	Total
10/27/2020	PS	JA: - make cover pages - download evidence - coordinate with client & client to replace various cover pages	1.8	\$60.00	\$108.00
10/28/2020	PS	JA: - make cover pages - download evidence - start making base doc JA	7.0	\$60.00	\$420.00
10/29/2020	PS	JA: - make cover pages - download evidence - continue making base doc JA	8.0	\$60.00	\$480.00
10/30/2020	PS	JA: - make cover pages - download evidence - continue making base doc JA	8.0	\$60.00	\$480.00
10/31/2020	PS	JA: - make cover pages - download evidence - continue making base doc JA	9.0	\$60.00	\$540.00
		2020 Subtotal - PS	234.2	\$60.00	\$14,052.00
		2021 Subtotal - PS	0.0	\$60.00	\$0.00
		2020 and 2021 - PS	234.2	\$60.00	\$14,052.00
		Total all Billers			\$184,515.07